

FILED
IN CLERKS OFFICE

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

2022 APR 26 AM 10:27

UNITED STATES OF AMERICA

v.

MARIE LECLAIR,

Defendant

Criminal No.

Violation:

Count One: Wire Fraud; Aiding and Abetting
(18 U.S.C. §§ 1343 and 2)

Forfeiture Allegation:
(18 U.S.C. § 981(a)(1)(C) and
28 U.S.C. § 2461)

U.S. DISTRICT COURT
DISTRICT OF MASS.
22cr10089

INFORMATION

At all times relevant to this Information:

General Allegations

1. The American Federation of Government Employees, Transportation Security Administration, Local 2617 (“the Union”) was a labor union based in Boston, Massachusetts.
2. Defendant Marie LeClair (“LECLAIR”) was the president of the Union.
3. Bank 1 was a financial institution headquartered in Boston, Massachusetts at which the Union maintained one or more accounts.
4. Credit Union 1 was a financial institution headquartered in Ft. Worth, Texas at which the LECLAIR maintained one or more accounts.

Scheme to Defraud

5. Beginning in or about March 2015, LECLAIR engaged in a scheme to defraud the Union by misappropriating funds belonging to the Union for her own personal use.

6. LECLAIR transferred Union funds from accounts belonging to the Union at Bank 1 to a travel debit card issued by Credit Union 1 in her own name without the knowledge or authorization of the Union.

7. LECLAIR utilized funds she had misappropriated from the Union for personal expenses.

COUNT ONE

Wire Fraud; Aiding and Abetting
(18 U.S.C. §§ 1343 and 2)

The United States Attorney charges:

8. The United States Attorney re-alleges and incorporates by reference paragraphs 1-7 of this Information.

9. From in or around March 2015 through in or around August 2018, in Boston, in the District of Massachusetts, and elsewhere, the defendant,

MARIE LECLAIR,

having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of materially false and fraudulent pretenses, representations, and promises, did transmit and cause to be transmitted by means of wire communications in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing the scheme to defraud, as set forth below:

Count	Approximate Date	Description
1	May 22, 2018	Wire transfer of \$3,000 from Bank 1 to a travel/debit card at Credit Union 1, Acct. No. *****6201.

All in violation of Title 18, United State Code, Sections 1343 and 2.

FORFEITURE ALLEGATION

(18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c))

10. Upon conviction of the offense in violation of Title 18, United States Code, Section 1343, set forth in Count One, the defendant,

MARIE LECLAIR,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense.

11. If any of the property described in Paragraph 10, above, as being forfeitable pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), as a result of any act or omission of the defendant --

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 10 above.

All pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

RACHAEL S. ROLLINS
United States Attorney

BY: /s/ Laura J. Kaplan
Laura J. Kaplan
Assistant U.S. Attorney

April 26, 2022